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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FRED A. KISER,
Plaintiff,
vs.

Case No.: 2:23-cv-01675-GMN-BNW

GOLDEN ENTERTAINMENT (NV), INC; a
Foreign Corporation; GOLDEN PAHRUMP
TOWN, LLC, a Domestic Limited-Liability
Company; DOE INDIVIDUALS I-X; and ROE
BUSINESS ENTITIES I-XX,
Defendants.

JOINT STIPULATION AND
[PROPOSED]
ORDER TO STAY DISCOVERY
DEADLINES
(SECOND REQUEST)

Pursuant to Local Rule (“Local Rule”) IA 6-1, LR IA 6-2 and LR 7-1, Fred A. Kiser (“Plaintiff”), and Defendants Golden Entertainment, Inc. and Golden Pahrump Town, LLC (collectively “Defendants”), by and through their respective undersigned counsel, hereby stipulate and agree to stay the current proceedings and extend all of the deadlines as enumerated in the parties’ Discovery Plan and Scheduling Order (EFC No. 23) by ninety-five (95) days¹, effective October 3, 2024. This is the second request and stipulation for a stay and extension of deadlines by the parties and is not being done for the purpose of delay.

¹ The parties considered the approaching holidays in requesting the amount of time.

I. Discovery Completed To Date.

Defendants and Plaintiff served their Initial Disclosures on November 15, 2023. The parties participated in an Early Neutral Evaluation conference on December 13, 2023. Both Plaintiff and Defendants have served formal written discovery to include interrogatories and requests for production of documents. The parties are aware of depositions that need to be taken and have discussed scheduling and logistics as some could require travel.

II. Remaining Discovery To Be Completed.

Depositions of parties and percipient witnesses. Additional formal written discovery may be required.

III. Reason Discovery Cannot be Complete Within the Original Deadline, Good Cause.

The parties believe good cause exists for their request to be granted. Ms. Christensen was on leave to care for her minor child who underwent major surgery in late December 2023, and required substantial care for two months thereafter which affected Ms. Christensen's availability to proceed with discovery in the early months of 2024. Ms. Christensen also had an unexpected medical emergency in May 2024, delaying her ability to appear for depositions and conduct discovery.

On December 29, 2023, Ms. Neal underwent spinal surgery planning to be out approximately 6-8 weeks for recovery. Ms. Neal's surgery could not be completed due to serious complications that necessitated two weeks in the ICU during which time she was diagnosed with two life threatening diseases/disorders. After healing from spine surgery and between April and August 2024, Ms. Neal was hospitalized five times in total for 51 days. When not hospitalized, Ms. Neal received infusions and/or transfusions three times a week, and during four of those weeks also received additional treatments five days a week, twice a day. Ms. Neal's last round of

1 treatments and therapies concluded on September 5, 2024. No further weekly therapies are
 2 currently contemplated, and Ms. Neal has returned to her employment duties on a part-time basis,
 3 transitioning too full-time.²

4 The parties have agreed that the discovery deadline should be extended for ninety-five
 5 (95) days, effective October 3, 2024, through Monday, January 6, 2025.

6 **IV. Revised Proposed Discovery Plan.**

7 All discovery in this case has and will continue to be conducted in accordance with the
 8 Federal Rules of Civil Procedure and applicable Local Rules of this District Court. The parties
 9 propose to the Court the following deadlines:

10 **a. Discovery Cut-off Date.**

11 The discovery cut-off deadline shall be **Monday, January 6, 2025.**

12 **b. Amending the Pleadings and Adding Parties.**

13 The date for filing motions to amend the pleadings or to add parties shall not be later than
 14 ninety (90) days prior to the discovery cut-off date and, therefore, not later than **Tuesday, October**
 15 **8, 2024.**

16 **c. Expert Disclosures.**

17 In accordance with Rule 26(a)(2), initial disclosures identifying experts shall be made
 18 sixty (60) days prior to the discovery cut-off date, and therefore, not later than **Thursday,**
 19 **November 7, 2024.** Disclosures identifying rebuttal experts shall be made thirty (30) days after
 20 the initial disclosures of experts and, therefore, not later than **Monday, December 9, 2024**
 21 (December 7 is a Saturday.)

22 **d. Dispositive Motions:** The parties shall file dispositive motions not more than

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 27 ² Should the Court require additional information the parties request a private conversation with the Court given the
 28 sensitive nature of additional disclosure.

1 thirty (30) days after the discovery cut-off date and, therefore, not later than **Wednesday,**
2 **February 5, 2025.**

3 e. **Pretrial Order:** If no dispositive motions are filed, and unless otherwise ordered
4 by this Court, the Joint Pretrial Order shall be filed no more than thirty (30) days after the date set
5 for filing dispositive motions and, therefore, not later than **Friday, March 7, 2025.** In the event a
6 dispositive motion is filed, the date for the filing of a pretrial order shall be suspended until thirty
7 (30) days after the decision of the dispositive motions or further order of the Court.

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9 f. **Fed. R. Civ. P. 26(a)(3) Disclosures:** If no dispositive motions are filed, and
10 unless otherwise ordered by this Court, the parties shall file the disclosures required by Fed. R.
11 Civ. P. 26(a)(3), and any objections thereto, with the Pretrial Order pursuant to Local Rule 26-
12 1(b)(5), not more than thirty (30) days after the date set for filing dispositive motions and,
13 therefore, not later than **Friday, March 7, 2025.**

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g. **Extension or Modification of the Discovery Plan and Scheduling Order:** In accordance with Local Rule 26-4, any motion or stipulation to extend a deadline set forth in this discovery plan and scheduling order shall be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline.

DATED this 11th day of September 2024.

DATED this 11th day of September 2024.

/s/ Victoria L. Neal

/s/ Deverie J. Christensen

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*GOLDEN ENTERTAINMENT (NV), INC.,
and GOLDEN PAHRUMP TOWN, LLC*

IT IS SO ORDERED.

Dated: September 12, 2024.


UNITED STATES MAGISTRATE JUDGE
BRENDA N. WEKSLER

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